

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DOUNGLAS JOHNSON,)	
)	
Plaintiff,)	
vs.)	Case No. 2022-cv-3718
)	
COOK COUNTY SHERIFF, <i>et al.</i>)	Honorable Robert W. Gettleman
)	
Defendants.		

**DEFENDANT SHERIFF THOMAS J. DART AND COOK COUNTY’S MOTION FOR
LEAVE TO FILE EXHIBIT 7 UNDER SEAL**

NOW COME Defendants, TOM DART, Sheriff of Cook County, and COOK COUNTY by their counsel, EILEEN O’NEILL BURKE, State’s Attorney of Cook County, and through her assistant, Rebecca J. Laue, move for leave to file an Exhibit containing the medical records of Plaintiff, Douglas Johnson under seal pursuant to Local Rule 26.2(b) and (c). In support thereof, Defendants state as follows:

1. These Defendants are finalizing their Motion for Summary Judgment, Memorandum in Support of Their Motion for Summary Judgment, and Statement of Facts.
2. This Court “may for good cause shown enter an order directing that one or more documents be filed under seal.” N.D. Ill. L.R. 26.2(b).
3. Exhibit 7 will be attached to the Defendants Statement of Facts pursuant to United States District Court, Northern District of Illinois Local Rule 56.1(a)(2).
4. Exhibit 7 contains sensitive medical documents that should not be publicly filed pursuant to HIPAA confidentiality concerns.
5. Defendants now move this Court to grant Defendant’ Motion to Exhibits 7 under seal.
6. The plaintiff’s counsel has no opposition to this motion.

CONCLUSION

WHEREFORE, Defendants respectfully request that the Court grant this motion and enter an order permitting Defendants to file under seal Exhibit 7 and grant any other relief as seen fit.

Respectfully submitted,

EILEEN ONEILL BURKE
State's Attorney of Cook County

By: /s/ Rebecca J. Laue
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on June 12, 2025, she caused a true and correct copy of the foregoing to be electronically filed with this Court using the Court's CM/ECF system, which will provide electronic notice of such filing to all counsel of record.

/s/ Rebecca J. Laue